



Driving progress
through partnership

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October 17, 2024

VIA ECF

The Honorable Judge Arun Subramanian
United States District Court for the Southern District of New York
500 Pearl Street, Courtroom 15A
New York, New York 10007

GRANTED. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 75.

SO ORDERED.

Re: *Juan B. Almanzar v. Santander Bank, N.A.*, No. 1:23-cv-10706 Arun Subramanian, U.S.D.J.
Date: October 18, 2024

Dear Judge Subramanian:

Pursuant to Your Honor's Individual Practices in Civil Cases Rule 11.C, Santander respectfully requests leave to file under seal certain documents in support of its Opposition to Plaintiff's Motion for Partial Summary Judgment, dated October 3, 2024. Specifically, Santander requests the following: (1) filing under seal Exhibits 1 (including Exhibits 1-1, 1-2, 1-4, 1-5, and 1-6), 4, 6, and 7 of the Laffey Declaration, dated October 17, 2024, in support of Santander's Opposition to Plaintiff's Motion for Partial Summary Judgment, and (2) filing redacted portions of Santander's Memorandum of Law in Opposition to Plaintiff's Motion for Partial Summary Judgment Motion and Santander's Responses to Plaintiff's Statement of Undisputed Facts Pursuant to Local Civil Rule 56. 1.

Santander previously filed a Consent Letter Motion to File Under Seal ("**Initial Letter Motion**," ECF No. 47), on October 3, 2024, to protect documents within Santander's Motion for Summary Judgment. The Court temporarily granted the Initial Letter Motion on October 7, 2024 (ECF No. 64). The documents and information Santander seeks to protect here are part of the same documents and information that Santander requested to protect in the Initial Letter Motion. Santander thus incorporates by reference the reasons and arguments stated in the Initial Letter Motion.

In accordance with Your Honor's Rule 11.C(i), Santander met and conferred with Plaintiff before filing the Initial Letter Motion. Plaintiff consented to Santander's request to file the information under seal.

For these reasons, Santander respectfully request that the Court issue an order sealing the requested documents.

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We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Casey D. Laffey

Casey D. Laffey

cc: Counsel of Record (*via ECF*)